

Aberdeen International Airport

From: [#ABZ Safeguarding](#)
To: [Bamlett R \(Rebecca\)](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 20 January 2022 15:44:13
Attachments: [image001.png](#)
[image705193.png](#)
[image279591.png](#)
[image278891.png](#)
[image445284.png](#)
[image187742.png](#)
[image369574.png](#)
[image966981.png](#)

This proposal is located outwith our consultation zone. As such we have no comment to make and need not be consulted further.

Kind regards

Kirsteen

**Aberdeen International
Airport**



#ABZ Safeguarding

abzsafeguard@aiairport.com

www.aberdeenaairport.com

Aberdeen International Airport Limited, Dyce, Aberdeen, AB21 7DU

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BT

From: radionetworkprotection@bt.com
To: [Bamlett R \(Rebecca\)](#)
Cc: [MacFarlane M \(Marc\)](#); radionetworkprotection@bt.com
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022 WID11729
Date: 12 January 2022 13:28:57
Attachments: [image004.png](#)



OUR REF; WID11729

Dear Sir/Madam

Thank you for your email dated 23/12/2021.

We have studied this offshore wind farm proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that, the Project indicated using the coordinates provided should not cause interference to BT's current and presently planned radio network.

Regards

Lisa Smith

Engineering Services – Radio Planner
Networks



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British Telecommunications plc

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Civil Aviation Authority

From: [Andy Wells](#)
To: [MS Marine Renewables](#)
Cc: [Windfarms](#)
Subject: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation
Date: 16 February 2022 17:04:22

Good afternoon,

Thank you for the above information regarding the Pentland Floating Offshore Wind Farm Scoping "Addendum" Consultation and apologies for the delay in replying.

Pentland Floating Offshore Wind Farm is an offshore array of up to ten floating Wind Turbine Generators (WTGs) connected to one another by subsea inter-array cables supported by floating structures. Up to two offshore export cables will carry the power generated by the PFOWF to a landfall location at the Dounreay coast. The project parameters that have changed of particular interest to the CAA are the potential increase in maximum hub height, maximum blade tip height and maximum rotor diameter. We note the section on aviation and radar and the potential impact on Wick's IFP and the inclusion in the scope of a possible new Wick surveillance system.

The CAA has no comments to add.

Kind regards

Andy

Andy Wells



Manager Rulemaking and Safety Publications
Safety and Business Delivery
Civil Aviation Authority

Tel: [Redacted]

Follow us on Twitter: @UK_CAA

Please consider the environment. Think before printing this email.

Due to the Covid-19 outbreak and in line with Government guidance, our staff are working from home and our offices are not currently open to walk-in visitors.

You can help us through this unprecedented time by not communicating with us via traditional post as far as possible. Instead, please email us until further notice.

Please see our [guidance relating to COVID-19](#) for more information

Fisheries Management Scotland

From: [Alan Wells](#)
To: [Bamlett R \(Rebecca\)](#)
Cc: [MacFarlane M \(Marc\)](#); [Alexa MacAuslan](#); [Alan Youngson \(alan.youngson@btinternet.com\)](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 26 January 2022 08:55:47
Attachments: [image001.png](#)

Dear Sir/Madam,

Thank you for the opportunity to provide comment on the scoping report addendum for the Pentland Floating Offshore Wind Farm. Thank you also for offering a short extension to the deadline for comments.

As you are aware, Fisheries Management Scotland, and our members, the Caithness and Northern DSFBs have previously commented. Fisheries Management Scotland are also members of the ScotMER Diadromous Fish Specialist Receptor Group, which have identified a number of evidence gaps related to the health, distribution, and impacts on Diadromous fish. We are concerned that the planning system for marine renewables is not leading to these evidence gaps being closed – in our view this is a symptom of the wider failings of the EIA system in Scotland.

We have reviewed the Scoping Opinion adopted by the Scottish Ministers on 28 September 2021. We welcome the fact that the input of FMS, Caithness DSFB and Northern DSFB are specifically highlighted and must be fully considered in the EIA report. We also welcome the following points

- Diadromous fish should be considered separately from marine fish.
- EMFs from subsea and dynamic cables should be considered in relation to pelagic fish species (we hope that this includes diadromous fish)
- That the developer should consider and include potential impacts over a larger study area to include the Rivers Borgie, Naver and Thurso SACs. However, we remain of the view that this study area is not sufficiently wide. In 2017 Marine Scotland Science tagged fish from the Armadale netting station on the north coast of Scotland in order to assess the 'mixed stock' nature of the net fishery in operation at that time. The [report](#) is available on the Scottish Government website. A combination of tracking and genetic assignment demonstrated that adult salmon on the north coast of Scotland were from rivers as far afield as the Spey SAC and the Outer Hebrides. The strategic nature of many of the sites being considered for marine renewable energy, and the wide range of rivers that potentially could be affected, is the primary reason that Fisheries Management Scotland, in addition to our members, respond to these developments.
- Reference to SAC rivers for diadromous fish in section 5.5.8. and the fact that all additional impacts scoped in above in paragraph 5.5.3 for marine fish and shellfish must also be scoped in for diadromous fish.
- The requirement for the impact of fish aggregation to be expanded on in relation to diadromous fish to include the potential for the structures to attract and offer shelter and favourable predation opportunities to predatory birds, mammals and larger fish.

We are disappointed that possible barrier effects do not need to be scoped in to the EIA Report. We were contacted by Xodus Group in late December, where they confirmed that barrier effects had been scoped out on the basis of the small scale and offshore location of the development, citing the limited (and not fully accessible) literature on this impact. Whilst we accept that the responsibility to understand and assess any impacts arising from this issue should not necessarily fall on an individual development, we do need to understand how these evidence gaps will be understood in future, including the contribution from the renewable energy sector into assessing these issues. It is not acceptable at a national, strategic level to accept that there is no information available and therefore ignore the issue. Xodus also stated that they 'hope' not to have to assess the impact for the development to act like an artificial reef, attracting fish to the area. We maintain that it is important that this is scoped in for diadromous fish, as artificial reef structures also run the risk of aggregating predators – an important concern for wild fish interests, particularly in such a strategically important area for migratory salmonids from a wide range of Scotland's rivers.

Please do not hesitate to contact us if you require any further information.

Kind regards,

Alan

Dr Alan Wells | CEO
Fisheries Management Scotland
11 Rutland Square, Edinburgh, EH1 2AS
Tel: [Redacted]

www.fms.scot

Highlands and Islands Airport Ltd

From: [HIAL Safeguarding](#)
To: [MS Marine Renewables](#)
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed
Date: 03 February 2022 12:58:17
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)

Your ref: 20/05164/SCOP

Our ref: 2021/329/WIC

Hello Marc,

I did review the scoping material and found the aviation assessment had already highlighted the potential impacts to HIAL, during the construction and operational phases, and therefore did not respond further.

I assume that the developer will be approaching HIAL, at an appropriate juncture, to discuss and address/mitigate any impacts to HIAL?

Yours faithfully,

Ed

Ed Boorman

HIAL Safeguarding (Acting for and on behalf of Highlands & Islands Airport Ltd)

m: [Redacted]

e: hialsafeguarding@traxinternational.co.uk

e: safeguarding@hial.co.uk

Historic Environment Scotland



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to:

MS.MarineRenewables@gov.scot

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Marine Laboratory
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Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300046189

21 January 2022

Dear Marine Scotland

**The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness -
Scoping "Addendum" Consultation
Scoping Report**

Thank you for your consultation which we received on 23 December 2021 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

We understand that the proposal is for an installation of, initially, a single floating wind turbine generator (demonstrator; maximum blade tip height of 201m) that will ultimately form part of a larger offshore Pentland Floating Offshore wind farm (PFOWF) array. The single demonstrator is planned to be deployed ahead of the wider array to test the floating technology. The offshore array infrastructure works will eventually comprise:

- Up to maximum 10 floating wind turbine generators of a maximum tip height of 300m; two options are currently being considered: 5 turbines at 300m or 10 turbines at 192m.
- Floating structures to support the turbines
- Mooring structures
- A network of inter-array cabling
- A maximum of 2 offshore export cables connecting the wind turbines to the onshore substation

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



The floating array is to be located approximately 6.5 - 8 km off the coast of Dounreay, Caithness. The PFOWF is 'an update' to the Dounreay Tri Project that was granted key consents in 2017. The Dounreay Tri project consisted of 2 turbines of 185-201m, approximately 6km off Dounreay.

Scope of assessment

We note that there is no cultural heritage chapter within the submitted 'Scoping Addendum Report'. However, in 2021 we received a draft 'Historic Environment Method Statement', setting out methodology for conducting the onshore and offshore aspects of the EIA, for which we provided detailed comments directly to the applicant. Therefore, our understanding is that cultural heritage will be considered in the EIA. You might find our previous comments on the historic environment methodology, included in the letter dated 29 October 2021, helpful. Our previous letter is attached for ease of reference.

Further information

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at <https://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Urszula Szupszynska and they can be contacted by phone on 0131 668 8983 or by email on Urszula.Szupszynska@hes.scot.

Yours faithfully

Historic Environment Scotland

Marine Scotland – Marine Analytical Unit

From: [Allen K \(Kathleen\)](#)
To: [MS Marine Renewables](#)
Subject: Consultation Response: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum"
Date: 17 January 2022 10:15:24

Dear Sir/Madam,

MAU has reviewed the Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum. We do not have any comments regarding potential socio-economic impacts associated with the changes outlined in the addendum.

We are, therefore, sending a “nil return” response.

Best wishes,

Kathleen

Kathleen Allen

Senior Social Researcher | Marine Analytical Unit | [marinescotland](#)

Kathleen.Allen@gov.scot

Working from home, available via Skype or email.

Marine Scotland Science

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Marine Scotland Licensing Operations Team
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17 February 2022

PENTLAND FLOATING OFFSHORE WIND FARM - SCOPING REPORT

Marine Scotland Science (MSS) have reviewed the relevant documentation and have provided the following comments.

Marine ornithology

Regarding ornithology, MSS have considered the 'Pentland Floating Offshore Wind Farm EIA Scoping Addendum' and the response from NatureScot (email 1 February 2022). Given the updated worst case parameters presented in Table 2.1 *Key Offshore Project Parameters*, the subsequent potential for increase impacts from proposed project changes in Table 6.1 *Summary of the potential impacts upon ornithological features to be considered within the EIA and whether there is potential for increased impacts from proposed project changes* and that the method of assessment remains unchanged from that presented in the scoping report, MSS have nothing further to add to the original response sought from the original scoping request.

Marine mammals

MSS consider the following changes to the project parameters (worst case scenario; as identified in Table 2) to be relevant to impacts on marine mammals:

- An increase in the number of moorings and anchors per wind turbine, from 3-6 to a potential maximum of 12
- An increase in the anchor spread radius from 600 m to 1,250 m.
- The addition of 3-8 (potentially 12) driven piles (8 m diameter) per WTG, rather than the sole option of drilled piles as per original scoping.
- Potential reduction in number of turbines, dependant on choice of turbine height (potential from 10 WTGs down to 5)

We consider that with the inclusion of driven piles to the Project Design Envelope (PDE), the primary impact pathway of concern for marine mammals from this project is now underwater noise during the construction phase.

Updated baseline

MSS note that IAMMWG (2021) has been used for abundance estimates. MSS are currently awaiting the full methodology from this report to be presented. However, the values presented in IAMMWG (2021) include those from an earlier version of the SCANS-III analysis, and have subsequently been updated. We therefore recommend that the abundance estimates provided in the updated Hammond et al. (2021) report are used. We are content with the shape and areas of the management units provided in IAMMWG (2021).

MSS note that the bottlenose dolphin Coastal East Scotland MU abundance published in IAMWWG (2021) is incorrect and is currently being updated. We recommend the use of the weighted mean population size of 224 (95% CI = 214 – 234), using data from 2015-2019 based on the population estimates presented in Arso Civil et al. (2021). This approach incorporates the variability in population estimates over this timeframe and has been discussed and agreed with University of Aberdeen and University of St Andrews, the two institutions involved in monitoring the population, and NatureScot. The workings for this calculation can be found on the NatureScot website ([East coast of Scotland bottlenose dolphins: estimate of population size 2015-2019 | NatureScot](#)).

Additional impacts

MSS acknowledge that there are no past consultee comments relating to the number of mooring lines, number of anchors and mooring spread and we agree that the impacts from these altered parameters are not new, nor will they change the assessment methodology. However, we consider that the proposed increase in the number and spread of mooring lines will increase the amount of mooring line in the water column, thereby potentially increasing the risk of entanglement to marine mammals. We note that the exact design and material of the mooring lines, which will determine the likelihood of entanglement, has not yet been confirmed and MSS would welcome further information on the technologies to be used, once available. Also of concern is the risk of secondary entrapment in derelict fishing gear and other marine debris that become caught in the mooring lines themselves. As per our previous scoping advice, we would recommend that strategies to minimise or remove such debris are considered.

MSS note that our original scoping advice recommended that underwater noise from possible UXO clearance and any further geophysical surveys should be included the EIAR if possible, to allow assessment of the project as a whole. We cannot see reference to either of these impact pathways in Table 5.2.

Changes to method of assessment

Given the expected increases in underwater noise emissions from the new project design envelope as a result of the potential use of driven piles, MSS agree that it will be necessary to undertake appropriate underwater noise modelling techniques at this stage and welcome the additional detail provided in the Scoping Addendum. MSS advise that for the assessment of underwater noise impacts, a suitable site specific, range dependent, underwater noise propagation model should be used. MSS would expect a detailed methodology and the assumptions used in the underwater noise modelling should be provided for transparency, to determine that the method used is appropriate to assess potential impacts. We recommend the use of dual criteria for Permanent Threshold Shift (PTS) onset (cumulative sound exposure level (SEL) and instantaneous peak sound pressure level (SPL)) and the use of a dose-response relationship to predict disturbance. We agree with the use of harbour porpoise dose-response curve for other cetacean species and the use of the harbour seal dose-response curve for grey seals, given a lack of other suitable data. We note that although there are caveats to this method, it is likely a precautionary approach due to the hearing sensitivity of these species. MSS are content to provide further advice on suitable underwater noise propagation modelling.

MSS agree that the use of iPCoD for quantifying the population-level consequences of disturbance and PTS for harbour porpoise, bottlenose dolphin, minke whale and both grey and harbour seals, is appropriate. The most up-to-date demographic parameters to use for these species within iPCoD are available in Sinclair et al. (2020). However, we note that the iPCoD approach cannot be used for both Risso's dolphin and white-beaked dolphin; species that are to be included in the assessment. MSS recommends that a quantitative assessment that predicts the numbers of individuals expected to be impacted is still carried out for these species, with the applicant presenting these numbers in the wider context of the population size and conservation status.

Marine fish ecology

MSS agree with the method to assess marine fish and shellfish impacts from underwater noise caused by pile driving. In addition to this, MSS recommend that the modelling follows a precautionary approach as there is evidence that some species of fish fail to display avoidance or fleeing behaviour such as a startle response to underwater noise and therefore may remain stationary when exposed to underwater noise and may not flee (Harding *et al.* 2016). Therefore, this consideration should be taken into account in the modelling to determine the worst-case scenario where fish do not flee from the noise.

MSS also recommend that underwater noise impacts to fish from possible UXO clearance should be included in the EIAR.

Commercial fisheries

The project changes that are of main interest to commercial fisheries are:

- the increase in the number of moorings and anchors per wind turbine, from 3-6 to a potential maximum of 12; and
- the increase in the mooring spread radius from 600 m to 1,250 m.

Although MSS agree that these increases are not new impacts from those presented in the Scoping Report and the approach to assessing them will not alter, there will be an increase in the project spatial footprint with the added complexity of more subsea infrastructure. This will increase the area unavailable to some types of commercial fishing practices, mainly mobile gear due to safety concerns and the risk of snagging gear. This should be considered within the fisheries displacement assessment. Marine Scotland has commissioned 'Good practice guidance for assessing fisheries displacement' which is awaiting publication. We recommend referring to this guidance once it is published.

Diadromous fish

The Scoping Opinion <http://marine.gov.scot/data/scoping-opinion-pentland-floating-offshore-wind-farm> and the accompanying information from Marine Scotland Science (same link) provide advice and information regarding diadromous fish, prior to the revised project details as in Table 2.1 of the Addendum. Insofar as the potential impacts listed in Table 4.1 apply to diadromous fish, MSS is content with what is now scoped in and out, but "and foraging areas" should be inserted after "spawning and nursery grounds" in "Direct habitat loss due to disturbance of spawning and nursery grounds" to cover, for example, foraging sea trout. However, it is unclear from the wording in Section 4.1 of the Addendum whether the potential impacts from Electromagnetic Fields (EMFs) from subsea and dynamic cables and Fish aggregation around floating structures and associated infrastructure are to be kept scoped in. MSS advise that these potential impacts should be scoped in for diadromous fish.

As with our previous advice on the scoping report for this project, comments made on marine fish ecology should also be applied to diadromous fish, where relevant.

MSS also note that the proposed river gradings for salmon rivers for 2022 are now available. <https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings-for-2022-season/>

Benthic ecology

The potential increase in number of anchors per turbine could lead to a greater spatial footprint of the project on benthic features. However, this does not change our previous advice on the impact pathways to be screened in for further assessment in the benthic section of the EIAR.

Physical environment / coastal processes

We have no comments to add on the proposed changes to the Pentland Floating Offshore Wind Farm project reported in the scoping report addendum, since the proposed changes are unlikely to impact physical processes. Comments were previously provided in response to the original scoping report, and these are still valid.

Aquaculture

With regard to aquaculture animal health we have no further comments to provide on the proposed changes to the Pentland Floating Offshore Wind Farm project. Please refer to comments provided in January 2021.

References

IAMMWG. (2021). Updated abundance estimates for cetacean Management Units in UK waters. JNCC Report No. 680, JNCC Peterborough, ISSN 0963-8091.

[Updated abundance estimates for cetacean Management Units in UK waters \(jncc.gov.uk\)](https://jncc.gov.uk/reports/680)

Hammond, P.S., Lacey, C., Gilles, A., Viquerat, S., Börjesson, P., Herr, H., Macleod, K., Ridoux, V., Santos, M.B., Scheidat, M., Teilmann, J., Vingada, J. & Øien, N. (2021). Estimates of cetacean abundance in European Atlantic waters in summer 2016 from the SCANS-III aerial and shipboard surveys.

https://synergy.st-andrews.ac.uk/scans3/files/2021/06/SCANS-III_design-based_estimates_final_report_revised_June_2021.pdf

Harding, H., Brintjes, R., Radford, A. N. and Simpson, S. D. (2016) Measurement of Hearing in the Atlantic salmon (*Salmo salar*) using Auditory Evoked Potentials, and effects of Pile Driving Playback on salmon behaviour and physiology. Scottish Marine and Freshwater Science Report Vol 7 No. 11.

Sinclair, R.R., Sparling, C.E. & Harwood, J. (2020). Review Of Demographic Parameters And Sensitivity Analysis To Inform Inputs And Outputs Of Population Consequences Of Disturbance Assessments For Marine Mammals. Scottish Marine and Freshwater Science Vol 11 No 14, 74pp. DOI: 10.7489/12331-1

<https://data.marine.gov.scot/dataset/review-demographic-parameters-and-sensitivity-analysis-inform-inputs-and-outputs-0>

Hopefully these comments are helpful to you. If you wish to discuss any matters further then please contact the REEA Advice inbox at MSS_Advice@gov.scot

Yours sincerely,

Renewable Energy Environmental Advice group
Marine Scotland Science

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E: MSS_Advice@gov.scot

Marc MacFarlane
Marine Scotland Licensing Operations Team
Marine Laboratory
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5 May 2022

PENTLAND OFFSHORE WIND FARM – HRA SCREENING FOLLOW-UP QUESTIONS

Marine Scotland Science (MSS) have considered the follow-up requests sent by MS-LOT on 26 April 2022.

Marine Ornithology

With respect to the first query: ‘In MSS’ response from 01 April 2022, it is noted that “RSPB highlight that an SPA for red-throated diver, ‘Caithness and Sutherland peatlands SPA’ has not been included in the long list but does have connectivity to the proposed cable corridor”. For the avoidance of doubt, could MSS please confirm whether or not it believes this should be addressed in the HRA Screening Opinion, per RSPB’s request?’

MSS confirm that this should be addressed in the HRA screening opinion.

With respect to the second request: ‘RSPB have also noted that, in its opinion, both in-combination and individual assessments should be carried out for wader and wildfowl species such as red-throated divers due to nearby terrestrial SPAs. Does MSS concur with this?’

MSS consider that it is appropriate for species such as red-throated diver to be assessed both alone and in-combination. Waders and wildfowl (and other migratory species/taxa) should be considered in a migration assessment alone and in-combination. Red-throated divers breed terrestrially but forage offshore in the breeding season and overwinter coastally (although their distribution can change from breeding season). The Caithness and Sutherland Peatlands SPA, with designated red-throated diver breeding population, has foraging distance connectivity with the proposed project, therefore it should be assessed alone and in-combination.

Advice on further assessment of terrestrial SPA species that could have connectivity with the project below Mean High Water Springs should be consulted upon with statutory nature conservation colleagues from NatureScot.

Diadromous fish

The Northern District Salmon Fishery Board (DSFB) response refers to the potential for visual effects from an array of wind turbines with rotating blades (direct visual impact of moving turbine blades and the related shadow flicker cast by moving blades) to be a spatial barrier to the migration of salmon. Fisheries Management Scotland (FMS) do not specifically mention visual effects in their response, but say that they are disappointed that possible barrier effects have not been scoped in.

The topic of shadow flicker insofar as it applies in fresh waters has recently been reviewed by Dodd and Briers (2021). Most of what they say is also likely to apply to the potential for direct visual impact. Dodd and Briers (2021) concluded that, '*While there is some information available about the response of Atlantic salmon to changes in light intensity (e.g., responses to strobe light or artificial light at night), there is no published information about the responses (biological or behavioural) of Atlantic salmon, or any fish species, to artificial light patterns of the characteristics associated with shadow flicker*'; and that, '*shadow flicker is unlikely to result in a change at the population level*'. They also recommended further research into the effects of shadow flicker/changes in light pattern/intensity on Atlantic salmon.

MSS would largely accept these conclusions as also applying to the salmon life-stages in the marine context, and endorse that information from further research would also be useful in a marine context.

However, on the basis of present information, MSS would not consider it to be a high priority need for marine renewables assessments, and the MSS position remains that barrier effects do not require assessment in the EIA Report for Pentland Floating Offshore Wind Farm.

Reference

Dodd, J.A. and Briers, R.A. (2021) The Impact of Shadow Flicker or Pulsating Shadow Effect, Caused by Wind Turbine Blades, on Atlantic Salmon (*Salmo salar*) CD2020_08. Scotland's Centre of Expertise for Waters (CREW).
https://www.crew.ac.uk/sites/www.crew.ac.uk/files/publication/CD2020_08%20Shadow%20Flicker%20-%20Main%20Report%20vFINAL%2020211202.pdf

Hopefully these comments are helpful to you. If you wish to discuss any matters further then please contact the REEA Advice inbox at MSS_Advice@gov.scot

Yours sincerely,

Renewable Energy Environmental Advice group
Marine Scotland Science

Maritime & Coastguard Agency

From: [navigation safety](#)
To: [Bamlett R \(Rebecca\)](#)
Cc: [MacFarlane M \(Marc\)](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 25 January 2022 15:22:10
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
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[image006.png](#)
[image007.png](#)

Good Day Rebecca,

Thank you for the opportunity to comment on the Scoping Report Addendum for Pentland Floating Offshore Windfarm.

The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the document received. We would like to comment as follows:

The MCA confirms we have no objections to the changes highlighted within the Scoping Report Addendum on this occasion and will stick on with the original Scoping Response provided for Pentland Floating OWF.

Best Regards

Vinu

Vinu John

Navigation Policy Advisor
Marine Licensing and Consenting
UK Technical Services Navigation

[Redacted]

vinu.john@mca.gov.uk



Maritime &
Coastguard
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E-mail: teena.oulaghan100@mod.gov.uk

Rebecca Bamlett
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

21 January 2022

Dear Rebecca,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED);

REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED); and

REGULATION 17 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED) (collectively referred to as the "EIA Regulations").

In respect of the proposed marine licence applications under the Marine (Scotland) Act 2010, the section 36 consent application under the Electricity Act 1989 and request for deemed planning permission under section 57 of the Town and Country Planning (Scotland) Act 1997 (as amended) for the above, Highland Wind Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

Highland Wind Limited propose to install a floating offshore wind farm (between 6 and 10 floating substructures and WTGs) with an installed capacity up to 100 megawatts with the aim to test and demonstrate a technology solution for floating offshore wind in Scotland. The Pentland Floating Offshore Wind Farm is an update to the Dounreay Tri Project that was consented in the same location for Hexicon AB in 2017.

Thank you for consulting the Ministry of Defence (MOD) on the above scoping report addendum which forms a revision to the Pentland Floating Offshore Wind Farm proposal for which a scoping opinion was adopted on 28 September 2021. This addendum was received by our office on 23 December 2021.

The scoping report "addendum" provides information regarding changes to the project description and addresses any potential alterations to impact scopes resulting from these. Namely, the increase in upper blade tip height, increasing the rotor diameter and hub height of the potential turbine to be deployed. Whilst the description of the development indicates a maximum blade tip height of 300m, an assessment has been completed using the maximum/worst case parameters for turbine dimensions identified in table 2.1 of the submitted scoping report addendum.

I write to confirm the safeguarding position of the MOD on the information that should be provided in the Environmental Statement to support any application.

The applicant has prepared a Scoping Report of the proposed development. This recognises the principal defence issues that will be of relevance to the progression of the proposed development.

The use of airspace for defence purposes in the vicinity of the proposed development have been appropriately identified and considered. The Scoping Report considers aviation and radar systems that may be affected by the proposed wind farm. The MOD is correctly identified as a relevant receptor in section 9.4 Aviation and Radar of the Scoping Report. Potential interference with military air traffic control and air defence radars during both construction and operational phases has been scoped out. We agree with this, the proposed offshore will not affect military radar systems.

Impact on military low flying has been scoped in and the applicant states in the Scoping Report that they are committed to lighting and charting the turbines. In the interests of air safety, the MOD would request that the development be fitted with MOD accredited aviation safety lighting in accordance with the Civil Aviation Authority, Air Navigation Order 2016.

MOD has concerns with the proposed wind turbines in relation to the proximity to Vulcan Naval Reactor Test Establishment (NRTE) and its surrounding sea approaches in terms of security. In relation to the onshore elements of the proposed development further consultation with the MOD by the developer will be required.

The onshore study area is located adjacent to the Vulcan Naval Reactor Test Establishment (NRTE), a MOD facility. At present, the exact cable landfall location and onshore cable corridor is unknown with options still under consideration by the developer. One of the potential options is to use a sea water inlet. Please note this is under the control of MOD and not Dounreay Site Restoration Ltd (DSRL) as stated, this may not be available due to site decommissioning.

The development will require export cables and onshore cables from the landfall location to the grid connection. Construction works to install these cables will take place within the onshore study area. The export landfall location may require Horizontal Directional Drilling or Pinning. As these onshore activities and construction works will take place near to Vulcan (NRTE) any impact on the MOD will need to be considered and assessed. The MOD will need to be consulted on the onshore components once further details are known to determine any impacts, including Nuclear qualification and seismic justification of any Vulcan (NRTE) site facilities.

In addition, the impact of marine and road traffic associated with the construction phase and once works are completed and also, offshore construction works may impact upon the MOD. The applicant will need to assess this within their Environmental Statement to ensure Vulcan (NRTE) operations are not affected.

The MOD will need confirmation that there will be no constraints to existing power capacity which could impact current and future operations at the Vulcan site.

Finally, the report correctly notes that access to the Vulcan site for ecological surveys would not be permitted. Please note, in 2017 MOD ecologists carried out ecological surveys on the Vulcan site and surrounding areas. These surveys were undertaken in collaboration with DSRL appointed ecologists to inform the EIA of DSRL's proposed Phase 3 decommissioning of the Dounreay site. The findings of these surveys were incorporated into the Environmental Statement which accompanied their planning application. This ecological data can be provided by DIO if requested.

The MOD reserves the right to make further representations during the consenting process should circumstances change.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

[Redacted]

Teena Oulaghan
Safeguarding Manager

NATS

From: [NATS Safeguarding](#)
To: [Bamlett R \(Rebecca\)](#)
Cc: [MacFarlane M \(Marc\)](#); [NATS Safeguarding](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022 [SG23851]
Date: 23 December 2021 15:23:22
Attachments: [image001.png](#)

Rebecca,

NATS has reviewed and has no disagreement with the applicant's section of the addendum (section 7) devoted to Aviation and Radar.

Regards,

Alasdair

NATS Safeguarding

NATS Internal

NatureScot

From: [Chris Eastham](#)
To: [Bamlett R \(Rebecca\)](#); [MacFarlane M \(Marc\)](#)
Cc: [Jenna Lane](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 01 February 2022 08:33:15
Attachments: [image001.png](#)

Hi Rebecca,

Thank you for the consultation below. We agree with what is proposed in the scoping report addendum and provide the following advice:

1. The new worst case parameters include potentially up to 12 moorings and anchors per wind turbine, a spread radius of up to 1,250m, and potentially up to 12 driven piles per wind turbine with each pile being approximately 8m in diameter. Although we agree the potential impacts that may result from these increases are not new impacts from those presented in the Scoping Report, and the approach to assessing them will not alter, the new worst case parameters will result in a much greater area of the seabed being impacted. This should be considered in the EIA Report in terms of disturbance and loss of benthic habitat and habitat supporting fish and shellfish.
2. Section 5.1 outlines the updated IAMMWG management units that they plan to use for estimating density baselines. However, the figure (189) given for the East Scotland BND management unit is not correct. NatureScot recommends the use of 224 for the total bottlenose dolphin population in the East Scotland management unit ([Hammond et al 2021](#)).
3. As stated in our scoping response, for disturbance due to physical presence of vessels we are content that 'physical presence' is scoped out providing disturbance from vessel activity is fully considered within the underwater noise assessment.
4. We are content with the proposed underwater noise modelling methods. For the disturbance assessment 5.3.3, other sources of density information (or proxies for density) should be considered. SCANS surveys are a snapshot from 1 day in July/August and are not sufficient to reflect what animals are using the coastal strip or for any seasonal differences. Obviously they will have their own survey data to refer to, and we also suggest they also look at the regional baselines (see [Hague et al 2020](#) and [Carter et al 2020](#)) if not already covered in the scoping opinion.

Kind regards

Chris

Dr Chris Eastham | Marine Sustainability Advisor

NatureScot | Battleby, Redgorton, Perth PH1 3EW [Redacted]

[nature.scot](#) | [@nature_scot](#) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

Northern Lighthouse Board



Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: [Redacted]
Fax:

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: Pentland Floating Offshore Wind Farm – Scoping Opinion
Our Ref: AL/OPS/ML/O6_17_703

Ms Rebecca Bamlett
Marine Licensing Casework Officer
Marine Scotland – Marine Planning and Policy
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

10 January 2022

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017; and REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (collectively referred to as the “EIA Regulations”).

Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness

Thank you for your e-mail correspondence dated 23rd December 2021 relating to the Scoping Report ‘Addendum’ submitted by **Highland Wind Limited**, relating to the proposed Pentland Floating Offshore Wind Farm.

It is noted that this ‘addendum’ provides information regarding changes to the project description and addresses any potential alterations to impact scopes resulting from these, namely an increase in upper blade tip height, increased rotor diameter and hub height of the potential turbine to be deployed and the addition of driven piles as an alternative anchor solution.

Northern Lighthouse Board have no objection to the content of the scoping report addendum.

Yours sincerely
[Redacted]

Peter Douglas
Navigation Manager

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Orkney Islands Council

From: Shona Turnbull <Shona.Turnbull@orkney.gov.uk>

Sent: 11 January 2022 11:27

To: MS Marine Licensing <MS.MarineLicensing@gov.scot>

Cc: planningconsultation <planningconsultation@orkney.gov.uk>

Subject: 21-515-MARCON Highland Wind Limited – Pentland Floating Offshore Wind Farm –
Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022

Classification: NOT PROTECTIVELY MARKED

Dear MS-LOT,

Whilst the changes proposed may have a significant impact on a number of biodiversity issues, these will be appropriately assessed by the other relevant authorities. The main change with regard to visual and landscape impacts for Orkney are outlined in the PFOWF EIA Scoping Addendum Report. Thus, the report indicates that the likely changes on the Hoy and West Mainland NSA and Hoy Wild Land are not significantly different to those already assessed, so not further comment is provided.

Regards,

Shona

Dr Shona Turnbull

Marine Planner

Orkney Islands Council

Working from home, so email is the best contact



Orkney Islands Council – Marine Services and Transportation

From: [harbours](#)
To: [MS Marine Renewables](#)
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed
Date: 02 February 2022 11:25:49
Attachments: [image001.png](#)

Classification: NOT PROTECTIVELY MARKED

Hi Marc,

Apologies for not letting you know. It appears we have had no comments in regards to this.

Kind Regards

Terri

Marine Services and Transportation

Orkney Islands Council
Harbour Authority Building
Scapa, Orkney
KW15 1SD
[Redacted]

RSPB

FAO Rebecca Bamlett
Marine Scotland
Email: ms.marinerenewables@gov.scot

Date: 10th January 2021

Dear Rebecca,

Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness

RSPB Scotland comments on Scoping Addendum Report

Thank you for consulting RSPB Scotland on the Scoping Addendum Report for the above proposed offshore windfarm.

The report correctly recognises that the proposed changes to the development could lead to larger predicted impacts on habitats and wildlife. However, since the proposed changes will not have an impact on the approach to modelling and assessment with respect to birds, and due to the fact that RSPB Scotland are currently involved in conversations with the Applicant regarding methodologies, we have no significant further comments to make in addition to our response to the original scoping report (dated 29th January 2021).

We do, however, make the following requests:

1. We note that the air gap between the lowest sweep of the rotor blades and the sea will remain the same at 22m, despite the proposed increases in turbine dimensions. We ask that the Applicant consider increasing this as a key mitigation measure as 22m is relatively close to the sea level and within potential collision height for many seabirds.
2. We also note that the radius spread of the turbine moorings is proposed to be doubled to 1250m. It is unclear from the report how this relates to the ornithological survey area that was expanded from 2km to 4km for all surveys from April 2021 (halfway through the survey period) following MS advice, and how far the mooring would be extending into the buffer zone. This should be clarified in the EIA report.

We hope you find these comments helpful. Should you wish to discuss any of the above please do not hesitate to contact me.

Yours sincerely,
[Redacted]

Bea Ayling
Conservation Officer
bea.ayling@rspb.org.uk

North Scotland Regional Office

North Scotland Regional Office
Etive House
Beechwood Park
Inverness
IV2 3BW

nsro@rspb.org.uk

Tel: [Redacted]
Facebook: [Rspbhighlands](#)
Twitter: [@RSPBNorthScot](#)
rspb.org.uk



The RSPB is part of BirdLife International, a partnership of conservation organisations working to give nature a home around the world.

Scottish and Southern Energy

MacFarlane M (Marc)

From: Watson, Peter <peter.watson@sse.com>
Sent: 19 April 2022 14:52
To: MS Marine Renewables; MS Marine Renewables
Cc: Bamlett R (Rebecca); MacFarlane M (Marc)
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Saved in eRDM

Hi Marc,
Details of the licence for the proposed asset can be found at [06889 - licence_redacted.pdf \(marine.gov.scot\)](#)

Regards

Pete

Peter Watson | Lead Marine Consents Manager
SSEN Transmission
10 Henderson Rd, Inverness, IV1 1SN
M: [Redacted] | **E:** peter.watson@sse.com
ssen.co.uk

Please note my working days are Monday – Thursday.



From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 19 April 2022 13:21
To: Watson, Peter <peter.watson@sse.com>; MS Marine Renewables <MS.MarineRenewables@gov.scot>
Cc: Bamlett, Rebecca <Rebecca.Bamlett@gov.scot>; Marc.MacFarlane@gov.scot
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed

WARNING: This email was sent from outside SSE. Think twice before opening any links or attachments and report anything you are unsure about with your 'Report Phishing' button.

Good afternoon Peter,

Thank you for responding. Could you please confirm which asset you are referring to? If there is a related marine licence number that would be ideal.

Kind regards,
Marc

From: Watson, Peter <peter.watson@sse.com>
Sent: 08 February 2022 09:35
To: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Cc: Bamlett R (Rebecca) <Rebecca.Bamlett@gov.scot>; MacFarlane M (Marc) <Marc.Macfarlane@gov.scot>
Subject: Re: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed

Good morning,

Thank you for the opportunity to review the Pentland floating offshore wind farm scoping addendum. We would like to request the additional inclusion of a chart showing all proposed developments in the area such that spatial relationships can be understood, the inclusion of proposed vessel management and delivery routes would be beneficial such that any additional threat to our asset can be understood, and appropriate comment made.

Regards

Pete

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 03 February 2022 12:31
To: Watson, Peter <peter.watson@sse.com>
Cc: MS Marine Renewables <MS.MarineRenewables@gov.scot>; Bamlett, Rebecca <Rebecca.Bamlett@gov.scot>; Marc.MacFarlane@gov.scot <Marc.MacFarlane@gov.scot>
Subject: [EXTERNAL] RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed

WARNING: this email has originated from outside of the SSE Group. Please treat any links or attachments with caution.

Good afternoon Peter,

A copy of the attached email was sent to transmission.commercial@sse.com and peter.watson@sse.com on 23 December 2021. The consultation period has now closed but MS-LOT are content to grant SSE a deadline of 11 February 2022 to submit any representations they wish to make on the scoping report.

Kind regards,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



From: Watson, Peter <peter.watson@sse.com>
Sent: 02 February 2022 11:13
To: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Subject: Re: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed

Hi Marc

I havn't recieved a request to comment on the scoping document from highland wind. could you please re-send?

Thaks

Pete

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 02 February 2022 10:25
To: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Subject: [EXTERNAL] Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed

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Dear Sir/Madam,

The closing date of 22 January 2022 for the consultation on this scoping addendum has now passed and we haven't received a response from you. Therefore, we are assuming a Nil return.

Kind regards,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**Scottish Environmental Protection
Agency**

From: [Planning.North](#)
To: [MS Marine Renewables](#); [Bamlett R \(Rebecca\)](#)
Subject: SEPA Ref 3811 Scoping "Addendum" Pentland Floating Offshore Wind Farm Dounreay, Caithness
Date: 12 January 2022 17:07:50
Attachments: [image003.png](#)

OFFICIAL

Dear Ms Bamlett

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017; and
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017
SCOPING OPINION FOR THE REVISED PENTLAND FLOATING OFFSHORE WINDFARM
SEPA REF 3811**

Further to your consultation below, we have reviewed the report below:

Pentland Floating Offshore Wind Farm EIA Scoping Addendum Report ASSIGNMENT A100671-S01 DOCUMENT A-100671-S01-REPT-005 17.12.2021

Highland Wind Limited is proposing a floating offshore wind farm comprising up to ten turbines to be deployed by 2025 with an installed capacity of up to 100 megawatts (MW) approximately 6.5 km off the coast of Dounreay, Caithness (Pentland Floating Offshore Wind Farm PFOWF Phase 2) to test and demonstrate commercial scale floating wind technologies in Scotland. The proposed parameters that have altered since submitting the original Scoping Report are: maximum hub height; maximum blade tip height; maximum rotor diameter; proportion of depth above water for the floating substructure; potential number of mooring lines, anchors and mooring spread that may be required has increased; and introduction of driven piles.

The Scoping Addendum Report concludes that the proposed changes to some of the turbine parameters (rotor diameter, hub height and overall tip height) do not materially alter the position of the original Scoping Opinion as the methodologies of assessment will remain the same. The decision to include pile driving however requires additional assessments and modelling to assess the impact of underwater noise on marine mammals and other megafauna, and fish and shellfish ecology.

In relation to SEPA's interests, we do not consider that any further matters require assessment within an EIA in relation to the Offshore EIA Report and we have no comments on proposed assessments and modelling methodologies.

Regards

Clare

Clare Pritchett
Senior Planning Officer
Planning Service, SEPA
Email: planning.north@sepa.org.uk
Telephone: [Redacted]
Part Time: T **nesday & Thursday**

Scottish Forestry

From: [Baranska A \(Agata\)](#)
To: [Bamlett R \(Rebecca\)](#)
Cc: [MS Marine Renewables](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 05 January 2022 09:44:48
Attachments: [image003.png](#)
[image004.png](#)
[image006.png](#)

Dear Rebecca,

thank you for contacting Scottish Forestry (SF) regarding the scoping report addendum submitted by Highland Wind Limited and focusing on the offshore element of the revised Pentland Floating Offshore Wind Farm. Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation, and as such comments on development proposals that are likely to impact on forests and/or woodlands. Since an offshore proposal doesn't fall into that category, SF has no comments to offer at this stage. However, SF would like to be consulted on the onshore infrastructure proposals for this project.

Your sincerely

Agata Baranska
Operations Manager
Scottish Forestry
Highland & Islands Conservancy
📍 Woodlands | Fodderty Way | Dingwall | IV15 9XB
📞 Mobile: [Redacted]
✉ agata.baranska@forestry.gov.scot

forestry.gov.scot
www.facebook.com/scottishforestry
[@scotforestry](https://twitter.com/scotforestry)



Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation.

Brave values are the roots that underpin Scottish Forestry, to create a workplace where our staff, and the people we work with, feel valued, supported and respected.
Be professional, **R**espect others, **A**ct with honesty and integrity, **V**alue teamwork and collaboration and **E**ncourage innovation and creativity.

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Annual average temperatures for Scotland from 1884-2018 using data from UK Met Office. <https://showyourstripes.info/>

Scottish Fishermen's Federation

From: [Malcolm Morrison](#)
To: [MS Marine Renewables](#); [MacFarlane M \(Marc\)](#)
Cc: [Bamlett R \(Rebecca\)](#)
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed
Date: 02 February 2022 13:23:45
Attachments: [image006.png](#)

Marc

Considering this went out on 23/12, who works then? And normally its 7 days prior notice to closing not 7 weeks after!

Anyway, if there are piles going in, the grounds lost to fishing must be scoped, if any. Given the lack of robust science we don't believe desk top modelling is sufficient for noise or EMF, why not take the opportunity to gather real time data?

Best Regards, Malcolm

Fishery Policy Officer
Mob [Redacted]

Tel. [Redacted]
www.sff.co.uk

Please be aware that as I am working from home, there may be occasions where I will send emails outwith the 9-5, that is to suit me, I don't expect replies at these times, only when you are working!

Connect with us:

Scottish Fishermens Federation | 24 Rubislaw Terrace | Aberdeen | Scotland | AB10 1XE

Connect with SFF:



Scottish Sea Farms

From: [Mark Steward](#)
To: [MS Marine Renewables](#)
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed
Date: 02 February 2022 12:31:01
Attachments: [image003.png](#)

Dear Marc

Thank you for consulting me on this proposal. I can confirm that Scottish Sea Farms have no comments to make on this proposal or the scoping addendum.

Kind regards

Mark

Mark Steward
Development Manager | Scottish Sea Farms
[Redacted]

scottishseafarms.com | [Twitter](#) | [LinkedIn](#) | [Facebook](#) | [Instagram](#)



Wear a face covering where required

Wash your hands regularly

Cover your nose and mouth if coughing or sneezing

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Scottish Water

Friday, 24 December 2021



Marine Licensing
375 Victoria Road

Aberdeen

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - [Redacted]
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

Pentland Wind Farm, Dounreay, Caithness, KW14 7TZ
Our Ref: DSCAS-0055419-SPZ
Proposal: Pentland Floating Offshore Wind Farm

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- ▶ Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - ▶ Site Investigation Services (UK) Ltd
 - ▶ Tel:[Redacted]
 - ▶ Email: sw@sisplan.co.uk
 - ▶ www.sisplan.co.uk

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Angela Allison

Development Services Analyst

PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

SIMEC Atlantis Energy Ltd

From: [Fraser Johnson](#)
To: [MS Marine Renewables](#)
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum" Consultation - By 22 January 2022 - Nil Return Assumed
Date: 02 February 2022 10:35:04
Attachments: [image001.png](#)

Hi Marc.

Apologies for not responding.

Nil return.

Regards

Fraser

Fraser Johnson

Operations & Maintenance Manager - Tidal

[Redacted]

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The Highland Council

Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Please ask for/Foighnich airson: Simon Hindson
Direct Dial/Àireamh fòn: [Redacted]
Our Ref/Ur n-àireamh-iùil: 20/05164/SCOP
Your Ref/Ar n-àireamh-iùil:
Date/Ceann-là: 7 February 2022

By Email only to:

MS.MarineRenewables@gov.scot

Dear Marc,

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

PROPOSAL: PENTLAND FLOATING OFFSHORE WIND FARM - CONSTRUCTION AND OPERATION OF A FLOATING WIND FARM COMPRISING UP TO 10 FLOATING STRUCTURES AND TURBINES WITH A MAXIMUM BLADE TIP HEIGHT OF 270M AND ASSOCIATED SUPPORTING ONSHORE INFRASTRUCTURE

LOCATION: DEVELOPMENT SITE 6KM NW OF, DOUNREAY NUCLEAR RESEARCH ESTABLISHMENT, DOUNREAY,

I refer to the above scoping opinion consultation related to the addendum scoping report, received on 23 December 2021. Thank you for the opportunity to comment and apologies for the delay in replying this has been due to other workload pressures.

This response should be read alongside our response of 05 February 2021. This response is structured around the structure of the EIA Scoping Report Addendum dated revision A02, dated 17 December 2022.

Description of Development

The change in parameters of the development are noted. We would however welcome clarity to be presented in the Environmental Impact Assessment Report based upon the worst case scenario. Based upon the information in the Scoping Report Addendum, if the maximum rotor diameter and maximum hub height was employed, along with the revised depth above water of the floating substructure the overall tip height would exceed the 300m set out in Table 2.1.

Fish and Shellfish Ecology; Marine Mammal and Other Mega Fauna; and Ornithology

The Highland Council do not have any comment to offer on these sections of the EIAR Scoping Report Addendum but anticipate that Marine Scotland Science, Scottish Environment Protection Agency and NatureScot will be offering comments.

ePlanning Centre: The Highland Council, Glenurquhart Road, Inverness, IV3 5NX

Email/Post-d: eplanning@highland.gov.uk Web/Lion: www.highland.gov.uk

Ionad dDealbhaidh: Comhairle na Gàidhealtachd, Rathad Ghleann Urchadain, Inbhir Nis, IV3 5NX

Aviation and Radar

It is our understanding that the turbines may be in proximity to the launch zone and projected route of the launch vehicles utilising the Sutherland Spaceport. As this is the case, it is considered appropriate that this should be scoped into the EIAR and assessed in this chapter.

Seascape, Landscape and Visual Impact

Subject to the comments in my letter of 05 February 2021, we are broadly content that the methodology remains the same despite the increase in turbine scale. The list of viewpoints require to be agreed with The Highland Council and NatureScot in due course.

Should you require any further information or clarification on any of the above, please do not hesitate to contact me.

Yours Sincerely,

Simon Hindson
Team Leader – Strategic Projects

ePlanning Centre: The Highland Council, Glenurquhart Road, Inverness, IV3 5NX

Email/Post-d: epanning@highland.gov.uk Web/Lion: www.highland.gov.uk

Ionad dDealbhaidh: Comhairle na Gàidhealtachd, Rathad Ghleann Urchadain, Inbhir Nis, IV3 5NX

The Northern District Salmon Fishery Board

From: [Alexa](#)
To: [MS Marine Renewables](#)
Subject: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness
Date: 06 January 2022 15:08:35

Good afternoon

Thank you for emailing through the addendum to the above scoping report.

I can confirm that the Northern District Salmon Fishery Board has no further comment to make at this stage.

Kind regards

Alexa

Alexa MacAuslan

Clerk

The Northern District Salmon Fishery Board

Tel [Redacted]

email: ndsfbclerk@gmail.com

website: <http://northern.dsfb.org.uk>

Sent from [Mail](#) for Windows

The Royal Yachting Association

From: [Pauline McGrow](#)
To: [Bamlett R \(Rebecca\)](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 24 December 2021 08:55:14
Attachments: [image005.png](#)
[image008.png](#)
[image009.png](#)

Hi Rebecca,

RYA Scotland agrees that the changed parameters will not affect the shipping and navigation section of the EIA. We have thus no comments in addition to the ones we made on the original report.

Kind Regards

Pauline

Pauline McGrow
Senior Administrator
Mob: 07436 296765

Royal Yachting Association Scotland
T: [Redacted]
E: pauline.mcgrow@ryascotland.org.uk



RYA Scotland, Caledonia House, 1 Redheughs Rigg, South Gyle, Edinburgh, EH12 9DQ
[Redacted]

Transport Scotland

From: [McPhillips G \(Gerard\)](#)
To: [MS Marine Renewables](#)
Cc: [Erskine A \(Andrew\)](#); [LOGAN Lesley](#); [DEVENNY Alan](#)
Subject: RE: Highland Wind Limited - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Scoping "Addendum"
Consultation - By 22 January 2022 - Nil Return Assumed
Date: 02 February 2022 12:39:52
Attachments: [image001.png](#)

Marc

I refer to your email below and apologise for the late response to your consultation request on the Addendum Scoping Report for the Pentland Floating Offshore Wind Farm (PFOWF). Your email was missed during the festive annual leave period.

Transport Scotland was consulted on the original 2020 Scoping Report for the PFOWF and provided comment in a letter dated 21st January 2021. Having reviewed the Addendum Scoping Report, I note that this supplements the 2020 Scoping Report by providing further information regarding changes to the project description as outlined below:

- increase in upper blade tip height
- increasing the rotor diameter and hub height
- the addition of driven piles as an alternative anchor solution.

I note that the changes involved in accommodating a larger WTG will not result in any increase in scale of the size of the floating substructures from what was proposed in the 2020 Scoping Report. As a result, several topics have not required to be reconsidered in the Addendum, including the Chapter on Traffic and Transport.

I can confirm, therefore, that Transport Scotland is satisfied that the comments in our letter of 21st January 2021 remain valid.

Regards.

Gerard



Gerard McPhillips
Transport Scotland
Development Management Quality Manager
Roads Directorate
[Redacted]

gerard.mcphillips@transport.gov.scot
transport.gov.scot

UK Chamber of Shipping

From: [Robert Merrylees](#)
To: [Bamlett R \(Rebecca\)](#)
Cc: [MacFarlane M \(Marc\)](#); [MS Marine Renewables](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 24 January 2022 19:50:19
Attachments: [image002.png](#)
[image003.png](#)

Dear Marine Scotland,

The UK Chamber of Shipping welcomes the opportunity to respond and apologises for the late submission, however in this instance has no substantive comments to make.

Kind regards,

Robert

Robert Merrylees
Policy Manager (Safety & Nautical) & Analyst

UK Chamber of Shipping
30 Park Street, London, SE1 9EQ

[Redacted]

rmerrylees@ukchamberofshipping.com

www.ukchamberofshipping.com

The image is a promotional graphic for the 'ANNUAL DINNER 2022'. The main graphic is a circular emblem with a dark blue top half containing the text 'ANNUAL DINNER 2022' in large, bold, yellow letters. Below this, a gold horizontal band contains the date '7th February,' and the venue 'JW Marriott Grosvenor House, London'. The bottom half of the circle is white and features the UK Chamber of Shipping logo on the left and the Royal Coat of Arms on the right. To the right of the main graphic is a vertical list of sponsors. At the top is a yellow box labeled 'Gold Sponsor' containing the Northern Marine logo and the text 'President's Reception'. Below this is a grey box labeled 'Silver Sponsor' containing the Denholm logo. At the bottom is a gold box labeled 'Bronze Sponsors' containing logos for JOTUN, V.Group, MLA COLLEGE, and VORTEXA. The UK Ship Register and Lloyd's Register logos are also present between the Silver and Bronze sponsor sections.

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Whale and Dolphin Conservation

From: [Fiona Read](#)
To: [Bamlett R \(Rebecca\)](#)
Cc: [MacFarlane M \(Marc\)](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 30 December 2021 18:02:28
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Rebecca,

Thank you for your email. Due to limited capacity, we will not be responding to the present consultation.

Best wishes for 2022,

Fiona

Fiona Read

Policy officer

End Bycatch

WDC, Whale and Dolphin Conservation

Telephone: [Redacted]

whales.org

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Wick Harbour Authority

From: [Harbour Master](#)
To: [MS Marine Renewables](#)
Subject: RE: Highland Wind Limited – Pentland Floating Offshore Wind Farm – Dounreay, Caithness – Scoping "Addendum" Consultation – By 22 January 2022
Date: 11 January 2022 08:25:18
Attachments: [image002.png](#)
[image003.png](#)

Good Morning Rebecca

This email is to inform you the Wick harbour Authority have a Nil Return for this matter.

Best regards

Ian

Ian Cormack

Harbourmaster

Wick Harbour

Tel: [Redacted]

Mob:

Email: ian.cormack@wickharbour.co.uk

